Robert E. Sabido, OSB No. 964168 rsabido@cvk-law.com Nicholas E. Wheeler, OSB No. 044491 nwheeler@cvk-law.com COSGRAVE VERGEER KESTER LLP 805 SW Broadway, 8th Floor Portland, Oregon 97205

Telephone: (503) 323-9000 (503) 323-9019 Facsimile:

Attorneys for Defendant

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

DEANNA TERNES,

Case No. CV-11-532 AC

Plaintiff,

٧.

NCO FINANCIAL SYSTEMS, INC.,

Defendant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE** FIRST APPEARANCE

Pursuant to Fed. R. Civ. P. 6(b), defendant moves to extend the deadline to file its first appearance up to and including June 2, 2011. This motion is supported by the accompanying Declaration of Nicholas E. Wheeler. Plaintiff's attorney, Joshua Trigsted, does not object to this requested extension.

DATED: May 23, 2011

COSGRAVE VERGEER KESTER LLP

/s/ Nicholas E. Wheeler Robert Sabido, OSB No. 964168 rsabido@cvk-law.com Nicholas E. Wheeler, OSB No. 044491

nwheeler@cvk-law.com Telephone: (503) 323-9000

Fax: (503) 323-9019

Attorneys for Defendant

Page 1 - UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FIRST **APPEARANCE** 

## **CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FIRST APPEARANCE on the date indicated below by: mail with postage prepaid, deposited in the US mail at Portland, Oregon, hand delivery, facsimile transmission, overnight delivery,  $\boxtimes$ electronic filing notification. If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below: Joshua Trigsted Trigsted Law Group, P.C. 5200 SW Meadows Road, Suite 150 Lake Oswego, OR 97035 Of Attorneys for Plaintiff DATED: May 23, 2011 /s/ Nicholas E. Wheeler

Nicholas E. Wheeler